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July 27, 2022

VIA ECF

The Honorable Ona T. Wang
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. Room 20D
New York, NY 10007-1312
(212)-805-0260

Re: *Garmashov v. United States Parachute Association, Inc.*
Case no.: 1:21-cv-04917-JGK-OTW

Dear Judge Wang:

Our firm represents Defendant United States Parachute Association, Inc., (“USPA”) in the above-referenced matter.

Pursuant to Rule I(a) of Your Honor’s Individual Practices, we request that the Pre-Settlement Conference Scheduling Call currently scheduled for **Thursday July 28, 2022 at 3:30 p.m.** be rescheduled to **July 28, 2022 at 4:30 p.m.**

If that is not possible, we would ask that the Pre-Settlement Conference Scheduling Call be rescheduled to **Monday August 8, 2022 at 9:00 a.m.**

We have contacted Plaintiff’s counsel Alex Kaufman, Esq. who has provided us the courtesy of consenting to the adjournment of the Pre-Settlement Conference Scheduling Call to those two dates and times, if that is agreeable to Your Honor’s schedule.

We respectfully request this rescheduling of Pre-Settlement Conference Scheduling Call based on the fact that we are engaged in Court Ordered oral argument of two substantive motions in the New York State Supreme Court, New York County before Hon Justice Paul Goetz on Thursday July 28, 2022 starting at 2:30 p.m. Based on the motion papers submitted to date we anticipate that it is likely that oral argument will take longer than an hour.

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Please advise if Your Honor can accommodate this request.

Respectfully Submitted,

/s/ Keith R.M. Roussel

Keith R.M. Roussel

cc: **VIA ECF**

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